

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BERKSHIRE SETTLEMENTS, INC.,
A Georgia Corporation,
CHURCH STREET NOMINEES, LTD.
An Isle of Man Corporation, and
ASSURED FUND,
A Cayman Islands Corporation,

CASE NO.: 09-CV-0006 (FB) (JO)

Plaintiffs

v.

ALEXANDER ASHKENAZI,
An Individual and as Trustee for
HALPERT ALEXANDER TRUST,
A New York Trust,
MALI HALPERT, an Individual,
JOHN HANCOCK LIFE INSURANCE COMPANY
A Foreign Corporation,
CAMBRIDGE SETTLEMENTS, LLC
A New York Corporation,
GLOBAL LIFE SETTLEMENTS, INC.
A New York Corporation, and
JOEL ECKSTEIN,
An Individual.

Defendants.

APPLICATION FOR ENTRY OF DEFAULT
AGAINST MALI HALPERT;
AFFIDAVIT OF CHARLES P. RANDALL IN SUPPORT

Plaintiffs, Berkshire Settlements, Inc., Church Street Nominees, Ltd., and Assured Fund, pursuant to Rule 55 (a), move this Court for an Order of default against Defendant, Mali Halpert, for her failure to plead or otherwise defend the action filed against it.

STATE OF FLORIDA
COUNTY OF PALM BEACH

BEFORE ME, the undersigned authority personally appeared Charles P. Randall, who, upon first being sworn, deposes and says:


1. My name is Charles P. Randall and I have personal knowledge of the matters stated herein.
2. Defendant, Mali Halpert, has failed to plead or otherwise defend the Fifth Amended Complaint that was served upon her on June 6, 2010 as shown on the filed Fifth Amended Complaint [D.E. 152].

FURTHER AFFIANT SAYETH NAUGHT.



Charles P. Randall

SWORN BEFORE ME this 30th day of July, 2010 at Palm Beach County, Florida by Charles P. Randall who I personally know who stated that the above is true to the best of his information and belief.



Notary Public State of Florida at Large

Seal



Personally Known.

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2010, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Eastern District's Local Rules, and/or the Eastern District's Rules on Electronic Service upon the following parties and participants: William Waldner, Co-counsel for Plaintiff, william@waldnerlaw.com; Robert L. Rimberg, Counsel for Halpert rlr@grlawpllc.com, Joe Grob, Counsel for Halpert, joeg@grlawpllc.com; Eric B. Post, Counsel for Hancock, epost@kelleydrye.com; Brian J. Green, Counsel for Cambridge, bgreen@capdlaw.com.

/s/ Charles P. Randall

Charles P. Randall
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